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UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

United States of America,

Plaintiff,

v.

Civil No. 2:07-cv-19-CAB

Jane Joyce Rice, et al.,

Defendants.

**PLAINTIFF UNITED STATES' OPPOSITION TO DEFENDANT
JANE JOYCE RICE'S MOTION FOR CERTIFICATION
OF ISSUE FOR INTERLOCUTORY APPEAL**

The United States of America, by its undersigned counsel, hereby opposes
Defendant Jane Joyce Rice's ("Jane Rice's") "Objection To And Motion To
Reconsider The Denial Of Amended Motion To Quash And For Findings Of Fact

And To Certify For Appeal Pursuant To 28 U.S.C. 1292(b)” (the “Motion”) (Doc. # 29).

In the Motion, Jane Rice requests that the Court certify two questions raised by her various motions to dismiss and to quash, all of which were denied on June 15, 2007. *See* Doc. # 28. Specifically, Jane Rice wishes to appeal (1) the question of whether she was properly served, and (2) the question of “whether the chief counsel has standing to authorize this case, and whether the court has in rem jurisdiction to foreclose on real or personal property within the State of Wyoming but without a federal enclave.” *See* Motion at 3. Jane Rice’s position with respect to both of these questions relies on her tenacious belief that the District of Wyoming is somehow distinct from the State of Wyoming. However, it cannot reasonably be disputed that every single inch of the State of Wyoming is encompassed by the District of Wyoming, *see* 28 U.S.C. § 131, or that every individual and object located in the State of Wyoming is also within the District of Wyoming. Accordingly, the issues Jane Rice seeks to appeal cannot meet 28 U.S.C. § 1292(b)’s requirements for certification because there is no “substantial ground” for questioning the Court’s June 15, 2007 ruling. Thus, the Motion should be denied.

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Dated: July 9, 2007

s/ Michael G. Pitman
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